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POSTAL SERVICE
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Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail Service
Standards

Docket No. C2001-3

JOINT MOTION TO POSTPONE DEADLINE FOR FILING
MOTION FOR RECONSIDERATION OR REQUEST FOR CERTIFICATION OF
PRESIDING OFFICER'S RULING NO. C2001-3/24
(June 7, 2002)

The Postal Service hereby requests that all parties considering filing either a request for reconsideration or a request for certification of an appeal from Presiding Officer's Ruling No. C2003-1/24, issued on June 5, 2002, be given additional time to do so.

In accordance with 39 C.F.R. § 3001.32(b)(2), a request for certification would be due on Tuesday, June 12th. The Postal Service has initiated internal consultations to determine the nature of its response to Presiding Officer's Ruling No. C2001-3/24. Those consultations are ongoing and will require additional communication among various Headquarters departments and further consultation with certain senior managers.

The Postal Service also has initiated consultations with the Complainant. Both the Postal Service and the Complainant wish to determine whether there is a mutually acceptable alternative resolution to the discovery dispute that prompted the Ruling. Because of postal counsel's schedule next week, there is no real prospect of conducting any such consultations before Monday, June 17th. In addition, Complainant will be out of the country during the latter part of June. The parties have agreed to continue their discussions during that period. Accordingly, it is requested that any and all parties be permitted to file any motion for reconsideration or request for certification no later than

Monday, July 3, 2002. The Postal Service is authorized to state that Complainant joins in this request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux
Chief Counsel
Ratemaking



Michael T. Tidwell
Attorney

CERTIFICATE OF SERVICE

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.



Michael T. Tidwell

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June 7, 2002